

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	Criminal No. 05-30057-MAP
)	
V.)	
)	
)	
NAOMI WATFORD,)	
Defendant)	

ASSENTED-TO MOTION TO CHANGE STATUS CONFERENCE DATE

Defendant Naomi Watford, with the assent of all parties, hereby requests that the court change the status conference date now set for July 11, 2006 to different date. Specifically, a change of conference date is requested from July 11 to July 17, 18, 19, or 21, if convenient for the court. (Each of these alternative dates is currently available for counsel to all parties.)

A change in date is requested because, on the same date that has been set for the conference, counsel for Watford is scheduled to begin a jury trial in a criminal case in the Eastern Hampshire District Court in Hadley. The trial is expected to last two or three days.

The trial date had been set prior to the date on which the conference date was set in this court. However, Watford's counsel had failed to record the trial date in the calendar which he had with him at the time the date was set for the status conference and, at the time the conference date was set, failed to inform the court to any conflict with the July 11 date.

Through counsel, Watford states:

1. Watford's defense counsel is available to attend a status conference in this case at any

time and date during the week of July 17, except the afternoon of July 20.

2. In a phone call with AUSA Karin Goodwin, she assented to a change in the conference date and represented that any time and date during the week of July 17th would be acceptable to the government.

3. In a phone call with Attorney Fogarty, he assented to a change in the conference date and represented that he could be available at any time and date during the week of July 17th, except the morning of July 20.

3. In a phone call with Attorney Mastroianni, he assented to the change in the conference date and represented that he could be available any time on July 17, 18, 19, or 21.

RESPECTFULLY,
NAOMI WATFORD, By Her Attorney,

s/ Myles Jacobson

Date: May 25, 2006

Myles Jacobson
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